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October 1, 2014

Filed Electronically

Hon. Susan D. Wigenton, U.S.D.J.  
United States District Court for  
the District of New Jersey  
M.L. King, Jr. Federal Courthouse  
50 Walnut Street  
Newark, NJ 07102

**Re: United States v. Michael Sorrentino  
Civil No. 14-558 (SDW)**

Dear Judge Wigenton:

On September 24, 2014 a grand jury indicted Mr. Sorrentino and his brother, Marc, on a seven-count indictment. He was arraigned before U.S. Magistrate Judge Mannion and was released on a personal recognizance bond. The initial appearance before Your Honor for arraignment on the Indictment is on October 6, 2014. I respectfully request the date be adjourned to October 21, 2014 at 10:00 a.m.

I have represented Michael Sorrentino during the investigative stages of this matter and was present with him before U.S. Magistrate Judge Mannion last week. I expect to be retained as his trial counsel in this matter but have not formally been retained as such.

The adjournment is requested because, prior to the Indictment, Mr. Sorrentino and his fiance had contracted to appear as participants in a reality TV program called "Marriage Boot Camp" which is being produced by Think Media Factory in Los Angeles, California. I enclose an email I received from Mr. Sorrentino's entertainment counsel requesting confirmation of his ability to appear. The filming was scheduled to start on October 5, 2014 and conclude on October 19, 2014 with travel to/from Los Angeles on the days before and after.

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October 1, 2014  
Page 2

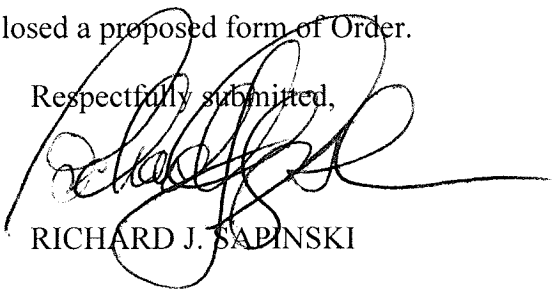
As noted, this is a pre-existing contractual commitment which Pre-Trial Services was made aware of prior to the proceedings last week. However, Pretrial is unable to grant Mr. Sorrentino permission to travel unless the Court were to adjourn the arraignment date.

I have discussed this matter with Assistant U.S. Attorney Evan Weitz who asked me to represent that his office does not consent to this request.

I respectfully submit that a two-week adjournment in the initial appearance of this matter to allow Mr. Sorrentino to fulfill this pre-existing contractual obligation is not unreasonable, is in the interests of justice and should be granted.

For Your Honor's convenience, I have enclosed a proposed form of Order.

Respectfully submitted,



RICHARD J. SAPINSKI

RJS/mm  
Enclosure  
cc: AUSA Evan Weitz, Esq.

**Richard Sapinski**

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**From:** Dave Feldman <dave@bhdrl.com>  
**Sent:** Tuesday, September 30, 2014 2:34 PM  
**To:** Richard Sapinski  
**Cc:** Josselyne Herman-Saccio; 'Josselyne Herman-Saccio'; Kagan, Michael  
**Subject:** FW: MBC- Michael Sorrentino

Hi Richard, good to speak with you today. To follow up on our call, Mike has a signed contract with Think Factory Media that was fully negotiated prior to the latest indictment and court appearance, for Mike and his fiancé Lauren to appear on a television program entitled Marriage Boot Camp. This is a program that features, other couples as well as Mike and Lauren and has firm production dates of Oct 5 ( travel on Oct 4) and finishes Oct 19<sup>th</sup>, 2014 ( return travel Oct 20<sup>th</sup>). The Production takes place in and around Los Angeles.

As these production dates are fast approaching , Think Factory needs immediate confirmation that Mike and Lauren are fully able to attend and participate in the program per their executed agreement. We greatly appreciate your and the court's assistance and response in this matter.

Look forward to hearing from you soon.

Please let me know if you have any further questions

Best, Dave

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**From:** Nicholas Williamson [mailto:nwilliamson@thinkfactorymedia.com]  
**Sent:** Thursday, September 25, 2014 12:33 PM  
**To:** Dave Feldman  
**Cc:** Josselyne Herman-Saccio; nwilliamson@thinkfactorymedia.com  
**Subject:** Re: MBC- Michael Sorrentino

October 4, 2014 is the travel day, the Shoot Days are October 5-October 19, 2014, return travel is on October 20, 2014.

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On Sep 25, 2014, at 12:22 PM, Dave Feldman <[dave@bhdrl.com](mailto:dave@bhdrl.com)> wrote:

Nick, in order to obtain court approval for Mike to do Marriage Boot Camp, we need to submit firm travel dates to / from LA for court approval. What are the exact dates needed? Thanks Dave

Dave

**From:** Nicholas Williamson [<mailto:nwilliamson@thinkfactorymedia.com>]  
**Sent:** Wednesday, September 24, 2014 2:53 PM  
**To:** Dave Feldman  
**Cc:** [nwilliamson@thinkfactorymedia.com](mailto:nwilliamson@thinkfactorymedia.com)  
**Subject:** MBC- Michael Sorrentino  
**Importance:** High

Dave:

It has come to our attention that your client, Michael Sorrentino, was indicted today, September 23, 2014, in New Jersey for allegedly not properly paying federal taxes on \$8.9 million dollars. While reserving all of their respective rights, both Thinkfactory Media and the network, WeTV, would like to know what limitations, if any, this legal matter will place on your clients' ability to appear on our "Marriage Bootcamp" program which is shooting October 4 through October 20, 2014 in Los Angeles, California. In addition, if your client appears on the program, your client will have certain promotional responsibilities related to the program, such activities likely to occur in May and June, 2015 in and around New York City and Los Angeles.

Please advise as soon as possible with regard to the foregoing.

The email is not intended to be a complete statement of the facts and nothing contained herein is intended as, nor shall it be deemed to constitute, a waiver or relinquishment of any

of TFM or WeTV's rights or remedies, whether legal, equitable or otherwise, all of which are hereby expressly reserved.

Regards,

Nicholas C. Williamson  
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Lauren Pesce  
732.962.3183

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